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18 *Attorneys for Robert Bosch LLC*

19 **UNITED STATES DISTRICT COURT**

20 **DISTRICT OF NEVADA**

21 ROBERT BOSCH LLC,
22 Plaintiff,
23 v.
24 ADM21 CO., LTD. ADM USA, and ADM
25 NORTH AMERICA,
26 Defendant.

27 Case No. 2:10-cv-1930

28 **COMPLAINT**

[JURY TRIAL DEMANDED]

29 Plaintiff Robert Bosch LLC (“Bosch”), through its attorneys, for its complaint against
30 Defendant ADM21 Co., Ltd., Defendant ADM USA and Defendant ADM North America
31 (collectively, “Defendants”), avers as follows:

32 1. This action arises under the patent laws of the United States, Title 35 of the
33 United States Code (for example, 35 U.S.C. §§ 271, 281, 283, 284, and 285) as hereinafter more
34 fully appears. This Court has jurisdiction over the subject matter of the action pursuant to 28
35 U.S.C. §§ 1331 and 1338.

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1 2. On April 29, 2003, United States Letters Patent No. 6,553,607 (attached as
 2 Exhibit A) were duly and legally issued for an invention in a wiper blade. Plaintiff is the owner
 3 of those Letters Patent.

4 3. Defendants have infringed and still are infringing those Letters Patent directly and
 5 indirectly by making, importing, offering for sale, using, and selling wiper blades embodying the
 6 patented invention, such as the GF4 wiper blade products, and will continue to do so unless
 7 enjoined by this Court.

8 4. On September 20, 2005, United States Letters Patent No. 6,944,905 (attached as
 9 Exhibit B) were duly and legally issued for an invention in a wiper blade. Plaintiff is the owner
 10 of those Letters Patent.

11 5. Defendants have infringed and still are infringing those Letters Patent directly and
 12 indirectly by making, importing, offering for sale, using, and selling wiper blades embodying the
 13 patented invention, such as the XF4 wiper blade products, and will continue to do so unless
 14 enjoined by this Court.

15 6. On December 13, 2005, United States Letters Patent No. 6,973,698 (attached as
 16 Exhibit C) were duly and legally issued for an invention in a wiper blade. Plaintiff is the owner
 17 of those Letters Patent.

18 7. Defendants have infringed and still are infringing those Letters Patent directly and
 19 indirectly by making, importing, offering for sale, using, and selling wiper blades embodying the
 20 patented invention, such as the GF4 and XF4 wiper blade products, and will continue to do so
 21 unless enjoined by this Court.

22 8. Defendants' infringement has caused and will continue to cause damage and
 23 irreparable harm to Bosch until enjoined by this Court.

24 WHEREFORE, Plaintiff demands an injunction against continued infringement, an
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1 award of damages, an assessment of interest and costs against Defendants, and such other relief
2 as the Court may find just and proper.

3 **JURY DEMAND**

4 Plaintiff demands a trial by jury.
5

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7

8 By: /s/ Cam Ferenbach
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